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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

MICHAEL G. SCHWERN,

Plaintiff,

v.

NÓIRÍN PLUNKETT,

Defendant.

Case No. 3:14-CV-00146-PK

**DECLARATION OF BEAR  
WILNER-NUGENT IN SUPPORT OF  
PLAINTIFF'S RESPONSE TO  
DEFENDANT'S SPECIAL MOTION  
TO STRIKE**

I, BEAR WILNER-NUGENT, make the following declaration under the penalty of perjury and based on my own personal knowledge. I am competent to testify to the following:

1. I am the attorney for the plaintiff in this action. I make this declaration in support of the memorandum of law that I filed on March 20, 2014, in response to defendant's special motion to strike the complaint under ORS 31.150. Specifically, I am submitting this declaration in opposition to defense counsel's emailed suggestion on March 30, 2014, that the exhibits I submitted in response to that motion were not properly authenticated.
2. I personally downloaded each of the exhibits to the motion from the internet on March 20, 2014.
3. I obtained the exhibits by following these URLs:

<b>Exhibit</b>	<b>URL</b>
1	<a href="https://twitter.com/ashedryden/status/381465338443202560">https://twitter.com/ashedryden/status/381465338443202560</a>
2	<a href="https://twitter.com/hypatiadotca/status/381511470099341312">https://twitter.com/hypatiadotca/status/381511470099341312</a>
3	<a href="https://twitter.com/eassumption/status/381706187219038208">https://twitter.com/eassumption/status/381706187219038208</a>
4	<a href="https://twitter.com/adainitiative/status/383096077668593664">https://twitter.com/adainitiative/status/383096077668593664</a>
5	<a href="http://adainitiative.org/2013/09/the-ada-initiative-does-not-support-michael-schwerns-ally-work/">http://adainitiative.org/2013/09/the-ada-initiative-does-not-support-michael-schwerns-ally-work/</a>
6	<a href="http://geekfeminism.org/2013/09/30/co-signing-the-ada-initiatives-statement-on-michael-schwern/">http://geekfeminism.org/2013/09/30/co-signing-the-ada-initiatives-statement-on-michael-schwern/</a>
7	<a href="http://stumptownsyndicate.org/2013/11/18/regarding-michael-schwern/">http://stumptownsyndicate.org/2013/11/18/regarding-michael-schwern/</a>
8	<a href="https://adainitiative.org/2011/07/oreilly-announces-anti-harassment-code-of-conduct/">https://adainitiative.org/2011/07/oreilly-announces-anti-harassment-code-of-conduct/</a>

4. All the exhibits are true copies of the publicly viewable content on the web pages available by following the above-listed URLs.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand that they are made for use as evidence in court and are subject to penalty for perjury.

RESPECTFULLY SUBMITTED March 30, 2014,

/s/ Bear Wilner-Nugent  
Bear Wilner-Nugent, OSB #044549  
Attorney for Plaintiff